

COUNTS ONE THROUGH TWENTY-FOUR

4. The factual allegations contained in paragraphs 1 through 3 of this Indictment are realleged and incorporated herein as if copied verbatim.

5. On or about the dates set forth below, in the Eastern District of North Carolina, MONTANNA B. GORE willfully aided and assisted in, and procured, counseled, and advised the preparation and presentation to the Internal Revenue Service ("IRS") of U.S. Individual Income Tax Returns, IRS Forms 1040 and Forms 1040A, as indicated below, for the clients and tax years set forth below. As GORE well knew and believed, the tax returns were false and fraudulent as to material matters, including but not limited to the false items described below:

COUNT	CLIENT	TAX YEAR	FORM FILED	APPROXIMATE FILING DATE	FALSE ITEM(S)
1	T.C.	2015	1040	1/30/2016	(a) Line 12 (Business Income or Loss) (b) Schedule C, Profit or Loss from Business (c) Line 68 (American Opportunity Credit)
2	T.C.	2016	1040	1/24/2017	(a) Line 12 (Business Income or Loss) (b) Schedule C, Profit or Loss from Business (c) Line 68 (American Opportunity Credit)
3	T.C.	2017	1040	1/22/2018	(a) Line 12 (Business Income or Loss) (b) Schedule C, Profit or Loss from Business

COUNT	CLIENT	TAX YEAR	FORM FILED	APPROXIMATE FILING DATE	FALSE ITEM(S)
4	B.L.	2015	1040A	3/01/2016	(a) Line 33 (Education credit) (b) Line 44 (American Opportunity Credit)
5	B.L.	2016	1040A	2/15/2017	(a) Line 33 (Education credit) (b) Line 44 (American Opportunity Credit)
6	D.R.	2015	1040	2/04/2016	(a) Line 12 (Business Income or Loss) (b) Schedule C, Profit or Loss from Business (c) Line 68 (American Opportunity Credit)
7	D.R.	2016	1040	3/01/2017	(a) Line 12 (Business Income or Loss) (b) Schedule C, Profit or Loss from Business (c) Line 68 (American Opportunity Credit)
8	D.R.	2017	1040	2/07/2018	(a) Line 12 (Business Income or Loss) (b) Schedule C, Profit or Loss from Business (c) Line 68 (American Opportunity Credit)
9	T.S.	2015	1040A	1/27/2016	(a) Line 44 (American Opportunity Credit)
10	T.S.	2016	1040A	2/04/2017	(a) Line 33 (Education credit) (b) Line 44 (American Opportunity Credit)

COUNT	CLIENT	TAX YEAR	FORM FILED	APPROXIMATE FILING DATE	FALSE ITEM(S)
11	T.S.	2017	1040A	2/03/2018	(a) Line 33 (Education credit) (b) Line 44 (American Opportunity Credit)
12	C.T.	2016	1040A	2/08/2017	(a) Line 44 (American Opportunity Credit)
13	A.J. & B.J.	2015	1040	1/19/2016	(a) Line 68 (American Opportunity Credit)
14	A.J. & B.J.	2016	1040	2/01/2017	(a) Line 68 (American Opportunity Credit)
15	A.J. & B.J.	2017	1040	2/06/2018	(a) Line 68 (American Opportunity Credit)
16	M.H.	2015	1040A	2/02/2016	(a) Filing Status (b) Line 33 (Education credit) (c) Line 44 (American Opportunity Credit)
17	M.H.	2016	1040	2/06/2017	(a) Filing Status (b) Line 12 (Business Income or Loss) (c) Schedule C, Profit or Loss from Business (d) Line 50 (Education credit) (e) Line 68 (American Opportunity Credit)
18	M.H.	2017	1040A	2/05/2018	(a) Filing Status (b) Line 33 (Education credit) (c) Line 44 (American Opportunity Credit)

COUNT	CLIENT	TAX YEAR	FORM FILED	APPROXIMATE FILING DATE	FALSE ITEM(S)
19	D.H.	2015	1040	2/02/2016	(a) Filing Status (b) Line 50 (Education credit) (c) Line 68 (American Opportunity Credit)
20	D.H.	2016	1040	2/06/2017	(a) Filing Status (b) Line 12 (Business Income or Loss) (c) Schedule C, Profit or Loss from Business (d) Line 50 (Education credit) (e) Line 68 (American Opportunity Credit)
21	D.H.	2017	1040	2/05/2018	(a) Filing Status (b) Line 12 (Business Income or Loss) (c) Schedule C, Profit or Loss from Business (d) Line 50 (Education credit) (e) Line 68 (American Opportunity Credit)
22	R.C.	2015	1040	4/18/2016	(a) Line 50 (Education credit) (b) Line 68 (American Opportunity Credit)
23	R.C.	2016	1040A	1/30/2017	(a) Line 33 (Education credit) (b) Line 44 (American Opportunity Credit)

COUNT	CLIENT	TAX YEAR	FORM FILED	APPROXIMATE FILING DATE	FALSE ITEM(S)
24	R.C.	2017	1040A	2/21/2018	(a) Line 33 (Education credit) (b) Line 44 (American Opportunity Credit)

All in violation of Title 26, United States Code, Section 7206(2).

COUNTS TWENTY-FIVE AND TWENTY-SIX

6. The factual allegations contained in paragraphs 1 through 3 of this Indictment are realleged and incorporated herein as if copied verbatim.

7. On or about the dates set forth below, in the Eastern District of North Carolina, MONTANNA B. GORE willfully made and subscribed U.S. Individual Income Tax Returns, IRS Forms 1040, for himself for the tax years set forth below, each of which was verified by a written declaration that it was made under the penalties of perjury and which GORE did not believe to be true and correct as to every material matter, which contained the following false items, among others, as set forth below:

COUNT	APPROXIMATE FILING DATE	TAX YEAR	FALSE ITEM(S)
25	1/27/2016	2015	(a) Line 22 (Total Income) (b) Line 68 (American Opportunity Credit)
26	4/18/2017	2016	(a) Line 22 (Total Income) (b) Line 68 (American Opportunity Credit)

All in violation of Title 26, United States Code, Section 7206(1).

COUNT TWENTY-SEVEN

8. The factual allegations contained in paragraphs 1 through 3 of this Indictment are realleged and incorporated herein as if copied verbatim.

9. During the calendar year 2017, MONTANNA B. GORE, a resident of Raleigh, North Carolina, had and received gross income exceeding \$10,400. By reason of such gross income, GORE was required by law, following the close of calendar year 2017, and on or before April 17, 2018, to make an income tax return to the IRS, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Knowing and believing all the foregoing, GORE willfully failed, on or about April 17, 2018, in the Eastern District of North Carolina, to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

COUNT TWENTY-EIGHT

10. The factual allegations contained in paragraphs 1 through 3 of this Indictment are realleged and incorporated herein as if copied verbatim.

11. During the calendar year 2018, MONTANNA B. GORE, a resident of Garner, North Carolina, had and received gross income exceeding \$12,000. By reason of such gross income, GORE was required by law, following the close of calendar year 2018, and on or before April 15, 2019, to make an income tax return to the IRS, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Knowing and believing all the foregoing, GORE willfully failed, on or

about April 15, 2019, in the Eastern District of North Carolina, to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

A TRUE BILL:

REDACTED VERSION

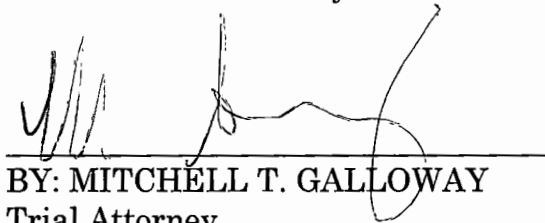
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

2/15/2022

DATE

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